

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Mark A. Edin, an individual,

Case Number: 13-cv-01856 (SRN/SER)

Plaintiff,

vs.

Associated Bank, N.A., a national
association, ABC Corporation, John Doe,
Mary Roe, and also all other persons
unknown claiming any right, title, estate,
interest, or lien in the real estate described
in the complaint therein.

**PLAINTIFF'S MOTION FOR A
PRELIMINARY INJUNCTION**

Defendants.

TO: DEFENDANT ASSOCIATED BANK, N.A., by and through its attorney of
record, Michael R. Sauer, Wilford Geseke, & Cook P.A., 8425 Seasons Parkway,
Suite 105, Woodbury, Minnesota 55125

MOTION

Plaintiff, Mark A. Edin ("Plaintiff") respectfully moves this Court for an Order
pursuant to Fed. R. Civ. P. 65(b), prohibiting Defendants, Associated Bank N.A.,
("Defendants"), from evicting Plaintiff or taking any action to dispossess Plaintiff from
his property.

A preliminary injunction pursuant to Fed. R. Civ. P. 65(b), is necessary to prevent
immediate and irreparable injury to Plaintiff, and Plaintiff's request an Order as follows:

- a. Prohibiting Defendants and all other persons or entities known
or unknown claiming any right, title, estate, interest, or lien in
the Property, located at 11756 Texas Avenue North, Champlin,

Minnesota, legally described Lot 2, Block 3, Southland Acres 3rd Addition, according to the map or plat thereof on file or of record in the Office of the County Recorder in and for Hennepin County, Minnesota in the Notice of Lis Pendens herein, from moving forward with any eviction of Plaintiff from his property, obtaining or serving a Writ of Recovery on Plaintiff and/or from taking any action to dispossess Plaintiff from his property; and

- b. For such other and further relief as the Court deems just and equitable.

This Motion is based on the accompanying Memorandum of Law, the Affidavit of Erich J.S. Hartmann, Esq., the files, records, and proceedings herein, and on the arguments of counsel, all of which are incorporated herein.

Respectfully Submitted,

DANIELS & KIBORT, PLLC

Dated: July 24, 2013

/s/ Erich J.S. Hartmann.
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ATTORNEYS FOR PLAINTIFF

